ROBERT WISNIEWSKI P.C. ATTORNEYS-AT-LAW

17 STATE STREET, SUITE 820 • NEW YORK, NY 10004 TEL: (212) 267-2101 • WEBSITE: www.rwapc.com

## MEMO ENDORSED

September 4, 2021

Hon. Edgardo Ramos, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 VIA ECF

Re: Animucka v. Singer et al

**Docket No.: 1:20-cv-07867 (ER)** 

Dear Judge Ramos,

I represent Plaintiff Stanislawa Animucka in this action. I write to respectfully request an two-and-a-half week extension of time until October 1, 2021 to file Plaintiff's motion for default judgment (the "Motion"). The current deadline to file the Motion has been set by the Court to September 13, 2021 in an Order, dated August 30, 2021. *See* Doc. No. 22.

The reason for the instant request is that I am currently abroad taking care of an urgent estate matter arising from my mother's passing. I am returning to the United States on September 8, 2021. My associate has already began drafting the Motion papers, but more time will be needed to finalize Plaintiff's supporting declaration and the calculations of damages. This is the first and hopefully the last request of this kind.

Wherefore, Plaintiff respectfully requests permission to file her Motion on or before October 1, 2021.

Granted. The deadline to move for default judgment is hereby extended to October 1, 2021. The Clerk of Court is respectfully directed to terminate the motion. Doc. 23.

So ordered.

Edgardo Ramos, U.S.D.J

Dated: 9/7/2021

New York, New York

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski